

November 17, 2023

Honorable Charles R. Breyer
United States District Judge
Phillip Burton Federal Building
450 Golden Gate Ave.
San Francisco, CA 94102

Re: *In re: Uber Technologies, Passenger Sexual Assault Litigation*
Case No. 3:23-md-03084-CRB

Dear Judge Breyer:

Pursuant to your Honor's November 6, 2023, Pretrial Order 3, I respectfully submit this application to serve as Plaintiffs' Steering Committee member of the Plaintiffs' Leadership Group. Please allow the below to serve as an introduction as well as an outline of the experience that I hope supports my request to serve in the capacity of a Steering Committee member in MDL 3084.

1. Professional Experience

While I do not have prior experience in federal multidistrict litigation, I have dedicated my entire career to the pursuit of justice for victims of traumatic experiences. I spent the first 15 years of my legal career serving as a state court criminal prosecutor. For the last 4 years, I have served as Lead Trial Attorney and Managing Partner of the California branch of Slater Slater Schulman; a role in which I almost exclusively represent survivors of sexual abuse in state court lawsuits. *See* Exhibit A (Resume of Michael W. Carney). Slater Slater Schulman also represents clients in the companion Uber JCCP pending in San Francisco Superior Court and has hundreds of Uber sexual assault cases under investigation but not yet filed.

I do not underestimate the complexity of the issues we will face in the immediate future in this matter. Luckily, I will be able to provide substantial and meaningful contributions to the committee with the support of my colleagues: Senior Associate Jaime Farrell and Senior Associate Lauren Welling. They have extensive experience in MDL litigation, including but not limited to involvement in the following matters:

MDL 1769, *In re: Seroquel Products Liability Litigation*
MDL 1871, *In re: Avandia Marketing, Sales Practices and Products Liability Litigation*
MDL 2100, *In re: Yasmin and Yaz (Drospirenone) Marketing, Sales Practices and Products Liability Litigation*
MDL 2299, *In re: Actos (Plioglitazone) Products Liability Litigation*
MDL 2652, *In re: Ethicon, Inc., Power Morcellator Products Liability Litigation*
MDL 2804, *In Re: National Prescription Opiate Litigation*
MDL 2885, *In re: 3M Combat Arms Earplug Products Liability Litigation*

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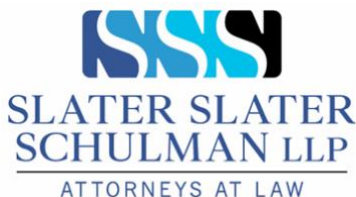
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MDL 2974, *In re: Paragard Liability Litigation*
MDL 2642, *In re: Fluoroquinolone Liability Litigation*
MDL 2809, *In re: Onglyza (Saxagliptin) and Kombiglyze (Saxagliptin and Metformin) Products Liability Litigation*

Finally, it should be noted that our firm presently represents several hundreds of plaintiffs in the Judicial Council Coordinated Proceedings pending in the state against Catholic Dioceses. In JCCP 5101, we represent over 300 survivors of childhood sexual abuse; in JCCP 5105, over 100; and in JCCP 5108, nearly 200. In addition, I presently represent creditor's committee members in the bankruptcy proceedings of the Archdiocese of San Francisco, the Diocese of Santa Rosa, and the Diocese of Oakland.

2. Judicial Contact Information

In Re: Northern California Clergy Cases, JCCP 5108
Hon. Evelio Grillo, Superior Court of California, County of Alameda, Dept. 21

In Re: Diocese of San Diego Cases, JCCP 5105
Hon. Eddie C. Sturgeon, Superior Court of California, County of San Diego, Dept. C-67

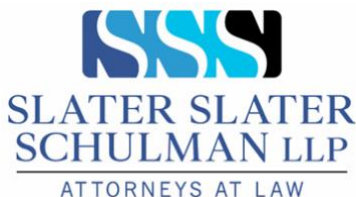
In re: Southern California Clergy Cases, JCCP 5101
Hon. David S. Cunningham, III, Superior Court of California, County of Los Angeles, Dept. 11

3. Commitment to this Litigation

Although I have commitments to other matters, including Judicial Council Coordinated Proceedings, such commitments are largely in the capacity of a leadership role and settlement discussions in mediation. I will commit to give my responsibilities in this MDL litigation the highest priority and will dedicate the time, attention, resources and other commitments that will be required in order to meet the Court's intended schedule of completing discovery such that cases can be remanded within this Court's anticipated timeline. Additionally, Slater Slater Schulman and our experienced team is fully committed to the representation of our clients and is ready to work towards the common benefit of all the plaintiffs in this litigation.

4. Ability to Work Cooperatively with Other Counsel

I have and will continue to work cooperatively with others, including Defendants and defense counsel, to advance this litigation until its disposition. Since this MDL was established, a team of individuals have been collaborating and working cohesively, on procedural and substantive issues to advance this MDL and advocate for every plaintiff. See Exhibit B (Proposed Plaintiffs' Leadership Group). I support, and enjoy the support of, the other applicants on this list for a leadership role on behalf of the plaintiffs in this litigation.



5. Resources Available to Prosecute this Litigation in a Timely Manner

I am presently handling our matters against Uber, both filed and unfiled, with the assistance of Senior Associate Jaime Farrell and Senior Associate Lauren Welling. In addition, Slater Slater Schulman employs over 75 full-time attorneys, nationwide. Nearly 25 of these attorneys are based in the California Branch that I manage. In addition, our California office employs nearly 75 paralegals and legal assistants as support staff. Should the need for immediate attention arise at any moment, a large contingent of our staff can be dedicated to expediently addressing the issue. We are well equipped to litigate in this MDL in a timely manner.

6. Additional Considerations for Appointment

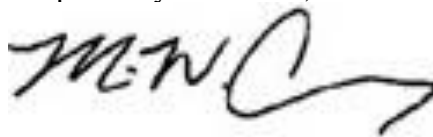
Slater Slater Schulman is truly dedicated to representing survivors of sexual assault. Our firm arguably represents more survivors of childhood sexual abuse and adult sexual assault than any other firm in the country. In New York, we've taken the lead in fighting for justice on behalf of hundreds of formerly incarcerated women who were sexually assaulted by the correctional officers who'd sworn to protect them. In Los Angeles County, we've taken the lead in fighting for over 1,000 survivors of childhood sexual abuse in the notorious county run shelter for children known as MacLaren Hall.

Fighting for justice and systemic change for survivors of rideshare related sexual assault is likewise an area of primary focus for our firm. As of the date of this application, we have already mediated and have been able to resolve approximately eighty (80) cases against a rival rideshare application to Uber and expect to mediate hundreds more over the next year or so. In this MDL, we expect to file lawsuits on behalf of over 200 additional plaintiffs in the months to come.

Respectfully, I believe I would be of value in a leadership role in MDL 3084 and submit my application seeking appointment to serve as a member of the Plaintiffs' Steering Committee.

Dated: November 16, 2023

Respectfully submitted,



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